Exhibit 14 Foreign Investment Interest Offset - RTC §24344(c) CALIFORNIA FRANCHISE TAX BOARD Internal Procedures Manual Water's Edge Manual Water's-Edge Group's Rev.: August 2004 Total Interest Expense Not Assigned Assigned To Assigned To Under Foreign Investment US Investment CCR §24344(c)(4). CCR §24344(c)(4). CCR §24344(c)(4). Was Debt Incurred Prior To January 1, 1988? No Yes Was Majority Of Debt Proceeds Apportion To Foreign Yes Used To Refinance Pre-1988 Investment By Formula Debt Or Line Of Credit? CCR §24344(c)(5)(b). CCR §24344(c)(5)(C). No No Interest Expense Attributable To Foreign Investment. Were Debt Proceeds Deposited CCR §24344(c)(3)(A). In Restricted Accounts And Not Used Or Transferred For Foreign Investment? If TY Beginning Prior To 1/1/1997 If TY Beginning 1/1/1997 & After CCR §24344(c)(5)(C). CCR §24344(c) Offset Is Yes CCR §24344(c) Offset Is Lesser of: Lesser Of Above Or 1.) 75% Of Above (or 100% If Dividend Deduction Under Qualifying Dividend From Specified RTC §24411. Construction Project.) Allocate to US. CCR §24344(c)(3)(B)1. OR 2.) Dividend Deduction Under RTC §24411. CCR§24344(c)(3)(B)2. Interest Expense In Excess Of RTC §24344(c). Remaining Interest Expense Subject To Regular Interest Reviewed: August 2004 Offset Under RTC §24344(b).

The information provided in the Franchise Tax Board's internal procedure manuals does not reflect changes in law, regulations, notices, decisions, or administrative procedures that may have been adopted since the manual was last updated